

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-20821

Hon. Arthur J. Tarnow

D-8 BAHIA ZEIDAN,

FILE UNDER SEAL

Defendant.

**EX-PARTE MOTION TO FILE DEFENDANT'S
SENTENCING MEMORANDUM UNDER SEAL**

NOW COMES Defendant, Bahia Zeidan, by and through her counsel James C. Thomas, of James C. Thomas, P.C., and hereby moves this Honorable Court for an order to seal her Sentencing Memorandum, along with any attached Exhibits, due to the sensitive nature of the materials and information contained therein, pursuant to U.S. District Court, Eastern District of Michigan, Local Rule 5.3; the fact that the release of said information contained in Defendant's Sentencing Memorandum could prove to be injurious to both the Defendant, Bahia Zeidan, as well as current government investigation; and due to the sensitive nature of the medical information and photos contained therein, which includes privacy concerns, HIPAA Privacy Rules.

WHEREFORE, Defendant requests this Honorable Court enter an order allowing her Sentencing Memorandum, with Exhibits, to be filed under seal.

Respectfully Submitted,

JAMES C. THOMAS, P.C.

By: /s/ James C. Thomas
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DATED: December 21, 2021

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Defendant.

**EX-PARTE ORDER TO ALLOW FOR THE FILING OF
DEFENDANT'S SENTENCING MEMORANDUM UNDER SEAL**

The above matter having come before the Court on the Defendant's Motion to File Defendant's Sentencing Memorandum and Exhibits Under Seal; and the Court being otherwise fully advised in the premises.

IT IS HEREBY ORDERED that Defendant's Sentencing Memorandum, along with its Exhibits, shall be sealed.

IT IS SO ORDERED.

s/Arthur J. Tarnow
District Court Judge

Entered: December 21, 2021